

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
FTX TRADING LTD., <i>et al.</i> , ¹)	Case No. 22-11068 (JTD)
)	
Debtors.)	(Jointly Administered)

Re: Docket No. 481

**THIRD SUPPLEMENTAL DECLARATION OF STEVEN
SIMMS IN SUPPORT OF THE APPLICATION
FOR AN ORDER AUTHORIZING THE RETENTION
AND EMPLOYMENT OF FTI CONSULTING, INC. AS FINANCIAL
ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

Pursuant to 28 U.S.C. section 1746, Steven Simms, declares as follows:

1. I am a Senior Managing Director with FTI Consulting, Inc. (“FTI”), an international consulting firm.

2. I submit this supplemental declaration (the “Third Supplemental Declaration”) on behalf of FTI to supplement the disclosures contained in (i) my original declaration (the “Original Declaration”) attached as Exhibit B to the *Application for an Order Authorizing the Retention and Employment of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of December 22, 2022* [D.I. 481] (the “Application”)²; (ii) the *Supplemental Declaration of Steven Simms in Support of the Application for an Order Authorizing the Retention and Employment of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors* [D.I. 696] (the “First Supplemental Declaration”); and (iii) the *Second*

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms used herein shall have meanings ascribed to them in the Application or the Original Declaration, as applicable.

Supplemental Declaration of Steven Simms in Support of the Application for an Order Authorizing the Retention and Employment of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors [D.I. 724] (the “Second Supplemental Declaration” and together with the Original Declaration and the First Supplemental Declaration, the “Declarations”). This Third Supplemental Declaration does not replace anything in the Application or the Declarations except as expressly set forth otherwise herein. Unless otherwise noted, I have personal knowledge of the matters set forth herein, and, if called as a witness, I would testify thereto.³

Supplemental Disclosure

3. It is my understanding that Sullivan & Cromwell, LLP, counsel to the Debtors, has retained a firm (the “Firm”) to provide consulting services (the “Engagement”) to the Debtors. Further, it is my understanding that the owner of this Firm is also an employee of Compass Lexecon LLC (“Compass Lexecon”)⁴, a wholly owned subsidiary of FTI. For the avoidance of doubt, neither FTI nor Compass Lexecon has any involvement in the services provided by this Firm, and neither will receive any revenue relating to the Engagement. As previously disclosed in the Original Declaration and First Supplemental Declaration, the ethical wall in place prevents anyone who is not a member of the FTI Committee Engagement from accessing the files and information relating to the FTI Committee Engagement.

4. FTI will continue to update and expand its ongoing relationship search for additional parties in interest. If any additional new material relevant facts or relationship are

³ Certain of the disclosures herein relate to matters within the personal knowledge of other professionals at FTI and are based on information provided by them.

⁴ Due to the complex nature of economic consulting, certain Compass Lexecon employees are permitted to take engagements in their personal capacities rather than in their capacity as employees of Compass Lexecon.

discovered or arise, FTI will promptly file a supplemental declaration pursuant to Bankruptcy Rule 2014(a).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 1, 2023.

/s/ Steven Simms

Steven Simms